

## REMARKS

Reconsideration is respectfully requested.

The Office Action dated March 28, 2003 rejects Claims 1-16 as being unpatentable over the Applicant's Admitted Prior Art. In reviewing the specification text, it was noted that due to a typographical error in the text, it appeared that the Physical Vapor Deposition (PVD) process was incorrectly indicated to be performed in "a conventional CVD (sic) chamber." Applicants have amended the specification text, so as to properly describe the prior art as teaching a PVD process. The amendment is supported by the remaining specification describing the invention, for example, see the text at page 5, lines 16-18, and at page 10, lines 1-8. Since both of these statements describe a feature of the invention as providing a first PECVD process "in the CVD chamber", and that the PVD and CVD process are not performed in the same chamber, the advantage being that the extra step of "transfer from the PVD chamber to the CVD chamber is eliminated", the inference is that in the conventional method, two separate chambers, a PVD chamber and a CVD chamber, are required. The amendment to the specification text reflects this feature. No new matter has been added.

With respect to the rejection of Claims 1-4 and 8, it is respectfully submitted that the originally filed specification, as amended (AAPA), fails to show the invention as originally claimed. To more clearly describe the originally claimed invention, Applicants have amended Claim 1, to further recite that the PECVD and LPCVD processes are sequentially performed in the same chamber. Thus, Claim 1 before the amendment, recited that the PECVD and LPCVD processes are performed sequentially, that is, without an intervening step of transferring the substrate and structure from a PVD chamber to a CVD chamber. However, the recitation "in the same chamber," after the amendment, more specifically points out the elimination of the transfer step, which is a feature of the invention. Support for this amendment is found *inter alia* at page 10, lines 7 and 8.

The recitation of both processes being performed in the same chamber was also recited in Claim 4, now amended. No new matter has been added.

Claim 4 has been amended to recite that the chamber in which the processes are performed is a "CVD chamber".

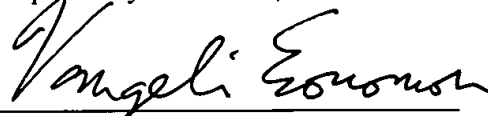
The Office Action further indicates that Claims 5-7 and 9-16 are rejected under 35 USC §103(a) over AAPA in view of Kweon et al.

It is respectfully suggested that although Kweon et al. may disclose certain process parameters that may overlap the parameters which have been recited in Claims 5-7 and 9-16, the teaching of the two deposition processes in the same chamber is not taught by Kweon et al. Thus the rejection under 35 USC §103(a) is considered improper as failing to set forth a *prima facie* case of obviousness. Additionally, even the overlap of the parameters described by Kweon et al. and recited in the pending claims is not exact. For example, the thermal treatment (Claim 11) is to be performed for one minute at a temperature between 300 and 500°C, but Kweon et al. only describe a thermal treatment from 400 to 700°C for a period of from 10 minutes to 5 hours.

For the above reasons, it is considered that the claims, as amended, find support in the parent application specification as filed, and that the combination of elements recited in the pending claims, as amended, distinguish over the references of record. Accordingly, an indication of allowable subject matter is earnestly solicited.

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Respectfully submitted,



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